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Attorney for Plaintiff Cecilia Ann Dixon

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CECILA ANN DIXON, an individual;

Case No. 2:21-cv-00172-APG-BNW

Plaintiff,

VS.

REQUEST TO EXTEND DISCOVERY DEADLINES

PACIFIC LIFE INSURANCE COMPANY,
and DOES I through X inclusive.

Defendants.

Plaintiff Cecilia Ann Dixon hereby requests that the Court grant not only the deadlines requested in Stipulated document 24, but also extend the Plaintiff's discovery deadlines. An additional sixty (60) days is requested. In addition to the information contained in Document 24, the following information is provided:

Specific description of the discovery that remains to be completed (LR 26-3(b)):

Discovery

- a. Deposition of Plaintiff's expert(s) if any
 - b. Deposition of Pacific Life's nurse/agent
 - c. Deposition of Pacific Life's Rule 30(b)(6) designee
 - d. Disclosure of the Parties' experts and rebuttal experts, if any

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1 **Reasons why the deadline was not satisfied or the remaining discovery was not**
2 **completed within the time limits set by the discovery plan (LR 26-3(c)):**

3 At the time she retained the undersigned, the Plaintiff made it clear that she intended to
4 participate in the litigation of this matter. She related that it would provide some consolation for
5 the loss of her husband. The Plaintiff's mother has been critically ill and the Plaintiff has made
6 many trips to Alaska to care for her mom. The Plaintiff will need more time to take depositions,
7 gather documents and make a determination on whether to engage an expert. The Plaintiff
8 believes that an additional sixty (60) days should be sufficient to allow completion of all
9 discovery.

10 **RESPECTFULLY SUBMITTED.**

11 Dated this 28th day of February, 2022

12 */s/ Travis E. Shetler*

13 By: _____
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21 *Attorney for Plaintiff*
22 *CECILA ANN DIXON*

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24 **ORDER**

25 IT IS ORDERED that ECF No. 29 is DENIED without
26 prejudice for failure to comply with the Local Rules regarding
27 meet and confers.

28 IT IS SO ORDERED
29 DATED: 4:49 pm, March 02, 2022

30 
31 BRENDA WEKSLER
32 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Law Office of Travis E. Shetler, PC, and that on the
3 28th day of February, 2022, and pursuant to FCRP 5(b), a copy of the foregoing **MOTION TO**
4 **EXTEND DISCOVERY DEADLINES** was served via the Court's CM/ECF system.

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Pacific Life Insurance Company

12 */s/ Mary Chopski*

13 An Employee of Law Office of Travis E. Shetler, PC

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